

Exhibit 1

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE PARTS
ANTITRUST LITIGATION

Master File No. 12-md-02311

Hon. Sean F. Cox
Mag. Judge R. Steven Whalen

THIS DOCUMENT RELATES TO:

ALL END-PAYOR ACTIONS

SUPPLEMENTAL DECLARATION OF JEFFREY N. LEIBELL

I, Jeffrey N. Leibell, declare:

1. I am Chief Legal and Financial Officer of Financial Recovery Services, LLC d/b/a Financial Recovery Strategies (“FRS”). In that capacity, my responsibilities include handling legal matters.

2. I submit this supplemental declaration in support of FRS’s Motion to Intervene. This declaration is based on my personal knowledge of FRS’s and its clients’ claims, as well as the relevant documents and communications.

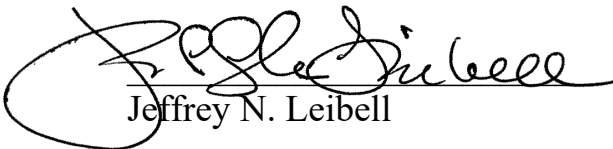
3. Various automobile insurers (“Insurers”) have retained FRS to file and manage their claims in the End-Payor Settlements of the multi-district litigation captioned above.

4. One of the Insurers, Selective Insurance Company of America (“Selective”), assigned its claims in this litigation to FRS. Attached hereto as

Exhibit A is a true and correct copy of the Assignment of Claims Agreement between FRS and Selective, dated June 24, 2020.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 25th day of June 2020, in Great Neck, New York.



Jeffrey N. Leibell